

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

CASE NO. 21-00363 MCF

CARMEN MILAGROS DAVILA RAMOS

CHAPTER 13

Debtor

INDEX\_\_\_\_

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FIRSTBANK PUERTO RICO

(x) of acts against property  
under

Movant

11 USC 362 (d) (2)

V.

( ) of other acts under 11  
USC 362

CARMEN MILAGROS DAVILA RAMOS;

(d) (1)

ALEJANDRO OLIVERAS RIVERA, as  
Trustee

( ) of co-debtor stay under  
11 USC 1201 (c) (2) or 1301  
(c) (2)

Respondents

URGENT MOTION FOR EXTENSION OF TIME TO FILE SUPPLEMENT TO PRE  
TRIAL REPORT AT DOCKET 134

TO THE HONORABLE COURT:

COMES NOW, creditor HECTOR NOEL RAMOS DAVILA represented by the undersigned attorneys and respectfully prays and alleges:

1. On July 21, 2021, Creditor, Héctor Ramos, filed a motion requesting relief from automatic stay. Dkt.64.

2. On June 16, 2022, a Pre-Trial report was filed by the parties. Dkt.134. The hearing is scheduled for February 1<sup>st</sup> and 2<sup>nd</sup> 2023. Dkt.157.

3. This Honorable Court instructed the parties to file another pre-trial report or supplement the original report if needed, on January 25, 2023.

4. Creditor only wishes to present a new valuation of the property, and present updated financial statements if everything is presented accordingly to the new numbers.

5. Creditor requests from this Honorable Court an extension of time until January 28, 2023, to file the supplement to the pre trial report at docket 134.

6. We have discussed this request with counsel for debtor and he agrees with the need to have the short extension of time.

**WHEREFORE**, it is hereby respectfully requested that an Order be entered GRANTING movant's Motion for extension of time until Friday January 28, 2023, to file the supplement to pre trial report at docket 134.

In San Juan, Puerto Rico this 25<sup>th</sup> day of January 2023.

By: /s/ Rafael A. Gonzalez Valiente

USDC NO. 225209

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